

EXHIBIT

MM

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF GODWIN QUINONES

I, Godwin Quinones, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in New York City when the terrorist attacks of the World Trade Center Towers occurred. At the time of these horrific attacks, I was working for American Building Maintenance in the North Tower as a maintenance porter when the terrorist attacks of the World Trade Center Towers occurred.

4. I arrived at work at 7:00 a.m. on the morning of September 11th. While I was in the basement of the North Tower (located directly under the lobby) with my supervisor, Anthony Saltalamacchia, I heard loud explosions coming from the elevator shafts. One of my friends (also a coworker) then ran into the office and yelled that there was a bomb in the building. I saw that

he had suffered horrible burns to his face and arm, and his flesh had been exposed beneath his skin. I will never forget my friend's agony and his disfigurement caused by these terror attacks.

5. Although I received instructions to stay inside of the North Tower, I became very nervous as I felt the building beginning to sway and I was actually lifted off of the floor due to the impending collapse of the building. I made the decision to get out of the North Tower and run to the area of the loading docks, and I encouraged my co-workers to escape with me.

6. I used my shoulder to charge into closed doors. I attempted to rescue other victims during the course of my escape. I pulled a man out of an elevator shaft that had been engulfed in flames and I helped him to escape through the loading docks.

7. After I escaped from the North Tower, I took the victims who had escaped with me over to the first ambulance that I could find. Despite my fear of the imminent collapse of the building, I then ran back towards the North Tower to find my mother, my brother, and my stepfather (all of whom worked in the North Tower) as I feared for their survival. At that moment, a man had jumped from the North Tower and his body exploded five feet in front of me as he hit the ground.

8. At that time, the scene in front of the North Tower could only be compared to a war zone. I saw bodies falling from the building, as well as body parts on the ground in front of me. Although I was in shock from the scenes I had witnessed, I had to return to the North Tower to check on my family. I then looked up to see that a second airplane had hit the South Tower. A massive explosion ensued, and I then had to duck to avoid falling debris from the explosion. At that point, I had no choice but to escape from the area. I ran towards the Brooklyn Bridge, and I watched in horror as the smoke, fire, and debris rained down around the area of the World Trade

Center Towers. I hoped and prayed that my other family members had been able to safely escape the North Tower without injury.

9. I then boarded a bus to my home, and I had the horrible feeling that my mother, brother, and stepfather had died in these horrific terrorist attacks while I was able to escape. To my incredible relief, I finally received a call later that evening from my mother. She informed me that all of my family members had escaped the North Tower prior to the collapse of the building, and they were each being treated for their injuries at the Brooklyn Hospital Center.

10. As a result of these terrorist attacks, I suffered the following specific physical injuries on September 11, 2001: a sprained left shoulder, forearm, left hand, traumatic tendinitis of the left wrist, and carpal tunnel syndrome. I also experienced the following injuries due to the large amounts of debris and chemicals that I inhaled on 9/11: shortness of breath, bronchitis, pneumonitis, a chronic cough, GERD, and diffuse headaches.

11. I further suffered, and continue to suffer, severe emotional distress and PTSD as a result of these terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events I experienced on 9/11. I lost friends and co-workers during these horrific terrorist attacks, and I watched as people jumped to their deaths from the burning towers. In the course of these attacks and my escape, I witnessed atrocities beyond the imagination of the average citizen.

12. I sought and continue to seek medical attention on a monthly basis for my physical and emotional injuries caused by these terrorist attacks. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received for my physical and emotional injuries following the September 11, 2001 terrorist attacks.

13. I previously pursued a claim (Claim Number Unknown) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on 9/11, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 8th day of January 2020.

A handwritten signature in black ink, appearing to read 'Godwin Quinones', written over a horizontal line.

Godwin Quinones

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**